

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 21-cr-10149-LTS
1. GEORGE FINCH,)	
)	
Defendants.)	
)	

ASSENTED TO MOTION FOR ENTRY OF A PROTECTIVE ORDER

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Local Rule 116, the United States hereby submits a proposed protective order—attached as Exhibit A—relating to documents and information to be produced in this case and respectfully requests that the Court enter the attached order as to the above captioned defendant. As grounds for this motion, the government states as follows.

The charges pursued in the Information in this case requires production of discovery that includes personal identifying information, law enforcement sensitive materials, financial and payroll records, telephone records, materials that may identify cooperating witnesses, and information regarding security measures (alarms) present in state and local buildings, among other sensitive materials.

The proposed protective order is necessary because of the sensitive nature of such information, which includes personal identification information of defendants and also third parties who are not associated with this litigation. The courts have specifically noted the importance of taking measures to protect personal identification information from unnecessary or unwarranted disclosure. *See, e.g.*, Local Rule 5.3; Fed. R. Crim. P. 49.1.

The attached proposed protective order seeks to establish additional protections in light of the circumstances of this case.

Similar protective orders have been entered in several cases in this District (including another case in which members of the same Boston Police Unit have been charged with similar crimes as well as in matters in which members of the Massachusetts State Police were charged with similar crimes). *See United States v. Torigian et al*, 20-cr-10164-NMG, Dkt. No. 65-66; *United States v. McAuliffe*, 19-cr-10056-DJC, Dkt. No. 14 (Dec. 14, 2018) (M.J. Cabell); *United States v. DeJong*, 18-cr-10307-MLW, Dkt. No. 27 (Oct. 24, 2018) (M.J. Cabell); *United States v. Wilson*, 18-cr-10290-RGS, Dkt. No. 35 (Oct. 10, 2018) (M.J. Cabell). *See also United States v. Joyce*, Dkt. No. 45 (February 22, 2018); *United States v. Thomas Corliss*, No. 16-CR-10250-LTS, Dkt. No. 34 (Feb. 7, 2017) (M.J. Bowler).

The above captioned defendant assents to the terms of the government's proposed protective order.

WHEREFORE, the United States respectfully requests that this Court enter the proposed protective order attached hereto as Exhibit A.

Respectfully submitted,

NATHANIEL R. MENDELL
ACTING UNITED STATES ATTORNEY

By: /s/ Mark J. Grady
Mark J. Grady
Assistant U.S. Attorney

Certificate of Compliance

The government has conferred with defense counsel and the parties are agreed on the terms of the protective order.

/s/ Mark J. Grady
Mark J. Grady, Assistant U.S. Attorney

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Mark J. Grady
Mark J. Grady, Assistant U.S. Attorney

Dated: May 19, 2021